
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Mark Falk

v. :

ARTURO MARTINEZ, : Mag. No. 04-
SANDY FRANCISCO HERNANDEZ,
CRISTIAN ANTONIO RAMIREZ, :
RAMON EMILIO URENA,
ANTONIO REYNOSO, and : **CRIMINAL COMPLAINT**
WILLIAM ROMAN

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. From in or around January 2000, to in or around August 2003 in Essex County, in the District of New Jersey and elsewhere, Defendants ARTURO MARTINEZ, SANDY FRANCISCO HERNANDEZ, CRISTIAN ANTONIO RAMIREZ, RAMON EMILIO URENA, ANTONIO REYNOSO, and WILLIAM ROMAN did:

knowingly and intentionally conspire and agree with each other and others to distribute and possess with the intent to distribute more than 5 kilograms of cocaine, a Schedule II narcotic drug controlled substance,

in violation of Title 21, United States Code, Section 846 and contrary to Title 21 United States Code Section 841(a)(1) and (b)(1)(A).

I further state that I am a Special Agent with Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

Bradley J. Benwell, Special Agent
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,
June 8, 2004, at Newark, New Jersey

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

I, Bradley J. Benwell, a Special Agent of Immigration and Customs Enforcement, following an investigation, am aware of the following facts:

1. From in or around January 2000 through in or around August 2003, Defendants ARTURO MARTINEZ (hereinafter "Defendant ARTURO MARTINEZ"), SANDY FRANCISCO HERNANDEZ (hereinafter "Defendant SANDY HERNANDEZ"), CRISTIAN ANTONIO RAMIREZ (hereinafter "Defendant CRISTIAN RAMIREZ"), RAMON EMILIO URENA (hereinafter "Defendant RAMON URENA"), ANTONIO REYNOSO (hereinafter "Defendant ANTONIO REYNOSO"), and WILLIAM ROMAN (hereinafter "Defendant WILLIAM ROMAN") conspired and agreed with one another and others to distribute and possess with the intent to distribute cocaine. The conspiracy alleged used operatives who were employees of Continental Airlines to 1) bring large quantities of cocaine from places outside the United States into the District of New Jersey through Newark International Airport (hereinafter referred to as "inbound drug flights") and 2) send large sums of United States currency representing proceeds of illegal drug sales outside of the District of New Jersey through Newark International Airport (hereinafter referred to as "outbound currency flights"). At various times throughout the life of the conspiracy, Defendants ARTURO MARTINEZ, SANDY HERNANDEZ, CRISTIAN RAMIREZ, RAMON URENA, ANTONIO REYNOSO, and WILLIAM ROMAN were employees of Continental Airlines.

2. According to a confidential witness (hereinafter "CW1"), from in or around January 2000 through in or around August 2003, CW1 was an employee of Continental Airlines who was involved with Defendants ARTURO MARTINEZ, SANDY HERNANDEZ, CRISTIAN RAMIREZ, RAMON URENA, ANTONIO REYNOSO, and WILLIAM ROMAN in a conspiracy to distribute and possess with the intent to distribute cocaine. According to CW1, the conspiracy used operatives who were employees of Continental Airlines to 1) bring large quantities of cocaine from places outside the United States into the District of New Jersey through Newark International Airport and 2) send large sums of United States currency representing proceeds of illegal drug sales outside of the District of New Jersey through Newark International Airport. During the life of the conspiracy, according to CW1, he/she together with Defendants ARTURO MARTINEZ, SANDY HERNANDEZ, CHRISTIAN RAMIREZ, and/or RAMON URENA would travel into Newark International Airport from Miami, Puerto Rico and/or the Dominican Republic and elsewhere with large Samsonite suitcases each containing between 15 and 17 kilograms of cocaine.

3. Additionally, according to CW1, as part of the conspiracy to distribute and possess with the intent to distribute cocaine, CW1, and co-conspirators including, but not limited to, ARTURO MARTINEZ, SANDY HERNANDEZ, and/or ANTONIO REYNOSO and others would travel from Newark International Airport to Miami, Puerto Rico and/or the Dominican Republic and elsewhere with large Samsonite suitcases containing large sums of United States currency which were the proceeds of the sale of cocaine.

4. According to CW1, during outbound currency flights, he/she would rely on

Defendants ARTURO MARTINEZ, SANDY HERNANDEZ, CRISTIAN RAMIREZ, RAMON URENA, ANTONIO REYNOSO, WILLIAM ROMAN and other Continental Airlines employees who were part of the conspiracy to act as lookouts and/or assure that suitcases containing United States currency were safely placed on the outbound aircrafts without incident.

5. According to CW1, when cocaine arrived on domestic inbound drug flights, he/she together with Defendants ARTURO MARTINEZ, SANDY HERNANDEZ, CRISTIAN RAMIREZ, and/or RAMON URENA would retrieve the suitcases containing cocaine from the baggage area for delivery into New York City.

6. Also according to CW1, when cocaine arrived on international inbound drug flights, he/she together with Defendants ARTURO MARTINEZ, SANDY HERNANDEZ, CRISTIAN RAMIREZ, and/or RAMON URENA would divert the suitcases containing cocaine from the international arrival baggage area to domestic arrival baggage area so as to circumvent customs inspections and arrange for delivery of those suitcases into New York City.

7. According to a confidential witness (hereinafter "CW2"), from in or around January 2000 through in or around August 2003, CW2 was an employee of Continental Airlines who was involved with CW1, Defendants ARTURO MARTINEZ, SANDY HERNANDEZ, ANTONIO REYNOSO, and WILLIAM ROMAN in a conspiracy to distribute and possess with the intent to distribute cocaine. According to CW2, the conspiracy used operatives who were employees of Continental Airlines to 1) bring large quantities of cocaine from places outside the United States into the District of New Jersey through Newark International Airport and 2) send large sums of United States currency representing proceeds of illegal drug sales outside of the District of New Jersey through Newark International Airport. During the life of the conspiracy, according to CW2, he/she assisted CW1 and Defendants ARTURO MARTINEZ and SANDY HERNANDEZ in checking in luggage containing large quantities of United States currency on outbound currency flights.

8. According to CW2, as part of the conspiracy to distribute and possess with the intent to distribute cocaine, CW1, CW2, Defendants ARTURO MARTINEZ, SANDY HERNANDEZ, and/or ANTONIO REYNOSO and others would travel from Newark International Airport to Miami, Puerto Rico and/or the Dominican Republic and elsewhere with large Samsonite suitcases containing large sums of United States currency which were the proceeds of the sale of cocaine. Also according to CW2, Defendants ARTURO MARTINEZ, SANDY HERNANDEZ, ANTONIO REYNOSO and WILLIAM ROMAN acted as lookouts and assured that suitcases containing United States currency were safely placed on the outbound aircrafts without incident.

9. Review of travel records for Continental Airlines reveals that co-conspirators including, but not limited to, ARTURO MARTINEZ, SANDY HERNANDEZ, CRISTIAN RAMIREZ, and RAMON URENA took numerous flights to and from Puerto Rico and the Dominican Republic including flights in which two or more co-conspirators traveled together.